

Exhibit 2

Page 1

1 IN THE UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF GEORGIA
3 DUBLIN DIVISION
4 ARIEL CURTIS,)
5)
6 Plaintiff,)
7) Civil Action No.
8 vs.)
9) 3:21-cv-15-DHB-BKE
10)
11 CORECIVIC, INC., CORECIVIC OF)
12 TENNESSEE, LLC, THE CITY OF)
13 ALAMO, GA, and CASANDRA BONEY,)
14)
15 Defendants.)

10 REMOTE VIDEOTAPED DEPOSITION OF
11 ARIEL CURTIS

13 February 7, 2022
14 10:04 a.m.

16 Debra J. Puckett, CCR B1188
17 Certified Court Reporter

21
22
23
24
25

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1 BY MR. PETERSON:

2 Q We will, I will show you that videotape
3 today and many clips from it, and we can walk
4 through it and I'll have various questions about it.

5 Regardless however of your failure to have
6 watched the videotape prior to today's deposition --

7 MR. KASPERS: Object to form.

8 BY MR. PETERSON:

9 Q -- you would agree that on the morning of
10 October 4th, I guess it was 2020, on your way to
11 work, you went through the metal detector at the
12 entrance to the Wheeler facility several times.

13 Do you recall that, Ms. Curtis?

14 A I recall going through that afternoon. It
15 wasn't that morning. I went through at 5:30 that
16 afternoon. On reporting to my shift, yes, sir, I
17 did several go through several times.

18 Q Thank you for that correction, Ms. Curtis.
19 I appreciate it.

20 So you do remember on the afternoon or
21 evening of October 4th, 2020 as you went to work,
22 you tried to go through the metal detector several
23 times at the entrance to the Wheeler facility.

24 You, you do remember that, right?

25 A Yes, sir, I do remember going through the

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1 metal detector.

2 Q And I think you just referenced that on
3 several times when you attempted to go through the
4 metal detector, it activated.

5 Do you remember that, Ms. Curtis?

6 A Yes, sir, I do remember activating it
7 several times as I went through.

8 Q Ms. Curtis, why do you think the metal
9 detector activated on those several occasions when
10 you tried to pass through it?

11 A I don't know why it activated when I tried
12 to pass through it several times. I don't work on
13 the metal detector, I just work at the facility.

14 Q Thank you, Ms. Curtis.

15 Do you contend in your lawsuit that the
16 reason the metal detector activated on the multiple
17 times when you tried to pass through it on that
18 morning was because the metal detector was
19 malfunctioning in some way?

20 MR. KASPERS: Object to form. Misstates
21 previous testimony. It was not the morning.

22 BY MR. PETERSON:

23 Q Ms. Curtis, do you contend that the metal
24 detector activated on the occasions that you tried
25 to pass through it on the evening of October 4, do

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1 you contend it activated because the metal detector
2 was malfunctioning in some way?

3 A Yes, sir, I do say the metal detector was
4 malfunctioning, because I've seen on numerous
5 occasions the metal detector go off and no one is
6 even going through it.

7 Q Okay. Can you identify those occasions?
8 Tell me dates, months, weeks, years. Can you tell
9 me the numerous occasions which you believe the
10 metal detector went off when no one was even going
11 through it? Can you identify those times for me,
12 please.

13 A I don't recall the exact dates at this
14 time, but the year was 2020 when I started working
15 at Wheeler Correctional Facility. I started in
16 March of 2020. From about March until October, the
17 metal detectors would go off when we come in. Where
18 they scan our items through, something could be
19 scanning through there, the metal detectors would go
20 off. Or if the metal detectors would just go off
21 and no one could be walking through or nothing could
22 be by it. It would just go off. As I said, I don't
23 know the exact dates at this time, but it was the
24 year of 2020.

25 Q Can you give me months on these times when

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1 Q And, and that she proceed through the
2 metal detector until she went through it without
3 activating it.

4 Did that make sense to you, Ms. Curtis?

5 A It made perfect sense to me.

6 Q Very good.

7 Okay. I, I may have missed it,

8 Ms. Curtis, I apologize, but did you say
9 there were other times when you saw Officer McLain
10 try to go through the metal detector and it
11 activated? Did, did you say something along those
12 lines?

13 A No, sir, I didn't say anything along those
14 lines. I said that one particular time that I saw.

15 Q Okay. Now, notwithstanding that you
16 haven't reviewed the video of the evening of October
17 4 when you walked through the metal detector, do you
18 recall that during the time that you went through
19 the metal detector several times, that there were
20 other people that went through the metal detector
21 during the same time period you were going through
22 it? Do you remember that?

23 A I recall two other officers going through
24 before me, because we all walked in together.

25 Q Do you remember those officers' names?

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1 A I don't recall their names at this time.

2 Q You would agree with me that the two
3 officers you recall going through the metal detector
4 during that same time period you were going through,
5 you would agree with me that when they went through
6 the metal detector, it did not activate?

7 A Yes, I would agree with you that when they
8 went through the metal detector, it did not activate
9 it.

10 Q Why do you think, Ms. Curtis, that the
11 metal detector didn't activate when other officers
12 walked through it, but when you walked through it
13 during the same time period it activated?

14 A As I stated before, sir, I'm not sure why
15 it activated on me. I just reported to work.

16 Q You indicated that you didn't report the
17 metal detector going off without anybody walking
18 through it.

19 Why didn't you report that malfunctioning
20 to anyone, Ms. Curtis?

21 A I didn't report the malfunctioning
22 incident to anyone else, sir, because I worked in
23 the back. I reported things of my job. The front
24 desk officer's job is to report whatever happens in
25 the front. And I was not the front desk officer.

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1 myself. But another officer informed me that the
2 same thing happened the night before.

3 Q Okay. Give me just one second, please,
4 Ms. Curtis.

5 MR. PETERSON: Ms. Court Reporter, I
6 apologize. Could you read that last question
7 back to me?

8 THE COURT REPORTER: Yes, sir. Hang on
9 one second. Do you want -- oh, I'll just,
10 okay.

11 (The record was read by the court
12 reporter.)

13 BY MR. PETERSON:

14 Q Okay. So another way of saying it,
15 Ms. Curtis, is you're not aware, personally aware,
16 of any employee who's ever been allowed access into
17 the Wheeler facility without clearing the metal
18 detector.

19 Do I understand that correctly?

20 A No, I'm not personally aware.

21 Q Got it. Then you mentioned that someone
22 told you about an incident. Can you tell me about
23 what you're referring to, Ms. Curtis?

24 A Yes. Another officer, Officer Garnett,
25 informed me that Lieutenant Corbit tried to access

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1 Q Do you know --

2 A I don't recall who she was at this time.

3 Q And do you believe that person was an
4 officer, that is, not a manager or a supervisor,
5 Ms. Curtis?

6 A Do I believe the person is a officer?

7 Q Yeah. The person you can't remember who
8 raised the complaint that you never saw, was that
9 person a non manager?

10 A Oh, yes. That person was a correctional
11 officer.

12 Q Very good. Okay.

13 Okay. Back to October 4th. And you went
14 through the metal detector. And again, we'll, we
15 can, I can show you the video in full in a minute.
16 But you remember, Ms. Curtis, that you went through
17 the metal detector a couple of times and it
18 activated. And then Ms. Creamer conducted a, a
19 patdown.

20 Do you recall that?

21 A Yes, sir, I do recall Ms. Creamer doing a
22 patdown after I went through the metal detector.

23 Q And, and do you agree that you don't have
24 any problem with Officer Creamer having conducted a
25 patdown of you at that time, do you, Ms. Curtis?

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1 A No, sir, I don't have a problem with
2 Officer Creamer conducting a pat search of me at the
3 time.

4 Q Okay. All right.

5 Now, do you recall that, that after the
6 patdown by Officer Creamer, then you walked through
7 the metal detector again, and once again it
8 activated.

9 Do you remember that, Ms. Creamer -- or
10 Curtis?

11 A Yes, sir, I do remember that.

12 Q And then, so after the patdown, you go
13 through the metal detector, it activates again.

14 Do you remember saying anything to Officer
15 Creamer at that time about why you think the metal
16 detector kept going off?

17 A I remember telling Officer Creamer I'm not
18 sure why the metal detector is going off, I don't
19 have anything on me. I remember telling Officer
20 Creamer that.

21 Q And then do you remember Officer Creamer
22 saying well, hold on a minute, just wait, she was
23 going to call Ms. Boney.

24 Do you remember that?

25 A Yes.

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1 pat search me. So I got --

2 Q Very good. Play it again.

3 (Video.)

4 BY MR. PETERSON:

5 Q Ms. Curtis, between the time Ms. Boney
6 directed you to walk back through the metal detector
7 so she could pat search you and this point where I
8 stopped the video, do you recall Ms. Boney saying
9 anything to you?

10 A Yes. She told me to bend over as far as I
11 could.

12 Q Did Ms. Boney tell you why she wanted you
13 to bend over?

14 A She was going to pat search me.

15 Q And play the video a little further.

16 (Video.)

17 BY MR. PETERSON:

18 Q Okay. Couple of questions. You saw that
19 apparently Ms., Ms. Boney did conduct a patdown
20 search of you, right?

21 A Uh-huh (affirmative).

22 Q You didn't have any objection to Ms. Boney
23 doing that pat search, did you, Ms. Curtis?

24 A No, sir, I had no objection at all.

25 Q Okay. And as you saw Ms. Boney do the pat

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1 search with you standing upright, you saw that?

2 A Yes, I did.

3 Q Well, Ms. Boney didn't pat search you
4 while you were bending over at all --

5 A -- captain Boney --

6 Q --

7 A -- Captain Boney told me to bend over as
8 far I could. I bent over, and I touched the floor.
9 She came up behind me and then she started and told
10 me to stand up.

11 Q Okay.

12 A Uh-huh (affirmative).

13 Q All right. Let's watch another couple
14 seconds of the video here, Ms. Curtis.

15 (Video.)

16 BY MR. PETERSON:

17 Q There, you saw that Ms. Creamer handed to
18 Ms. Boney a wand.

19 Do you see that, Ms. Curtis?

20 A Uh-huh (affirmative).

21 Q And you saw that it looked like there were
22 some words exchanged between Ms. Boney and
23 Ms. Creamer.

24 Do you recall what they said?

25 A I don't. I don't recall at this time what

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1 they said.

2 Q And, and do you recall saying anything in
3 this, that, that, that moment we just looked at in
4 the video, Ms. Curtis?

5 A No, I don't recall saying anything at this
6 time.

7 Q Okay. Let me continue.

8 (Video.)

9 BY MR. PETERSON:

10 Q All right. We stopped the video there.

11 Did, in this last clip we just looked at,
12 Ms. Curtis, Ms. Boney's wand searching you, that is,
13 putting the wand in front of you and behind you to
14 see if it activates; is that correct?

15 A That's correct.

16 Q And, and do you recall as Ms. Boney passed
17 the wand in, in front of your groin that the wand
18 activated? Do you recall that, Ms. Curtis?

19 A No, sir, I do not recall that.

20 Q Okay. While Ms. Boney was conducting the
21 wand search, do you recall her saying anything to
22 you or you saying anything to her during that
23 procedure?

24 A No, sir, I don't recall saying anything at
25 the time.

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1 Q Am I correct that you don't have any
2 objection to Ms. Boney having performed this wand
3 search of you? Is that correct, Ms. Curtis?

4 A That's correct, I have no objection at
5 all.

6 Q Okay. At any time on October 4th from the
7 time you came into the facility until the time you
8 left the facility later that evening, at any time
9 did you ever say anything to either Ms. Creamer or
10 Ms. Boney to the effect, something to the effect
11 that maybe the metal detector was being activated
12 because you had diamonds on your underwear?

13 A No, sir. From the time I entered the
14 facility until the time I left the facility, I said
15 nothing about underwear.

16 Q Okay. And nothing about diamonds on any
17 undergarment? You never said anything even remotely
18 like that to either Ms. Creamer or Ms. Curtis?
19 Excuse me.

20 You never said anything remotely like that
21 to either Ms. Boney or Ms. Creamer?

22 A No, sir. I said nothing remotely to
23 anything about underwear.

24 Q And if Ms. -- well, let me, let me be
25 crystal clear.

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1 recall being said between the time you left the
2 facility and the time you got to your vehicle?

3 A I don't recall anything being said. When,
4 by the time, from the time we left the facility from
5 the time we got to the vehicle, I don't recall
6 anything at this time being said. I remember
7 everything being said at the vehicle.

8 Q Okay. You got to your vehicle, you
9 unlocked the door to your car, to your vehicle?

10 A Yes, sir, I did unlock the door to my
11 vehicle.

12 Q You opened the door and you sat down in
13 the front seat of your vehicle?

14 A No, sir, I did not sit down in the front
15 seat of my vehicle. When I opened the door to my
16 vehicle, that's when Captain Boney said pull your
17 pants down.

18 Q Okay. So you hadn't, you opened the door
19 to your vehicle, and then Captain Boney said pull
20 your pants down?

21 A Yes. I opened the door to my vehicle,
22 then Captain Boney said pull your pants down.

23 Q And you said what in response to Captain
24 Boney saying pull your pants down?

25 A That's correct. I said wait, because I

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1 needed to understand. I needed to know that she was
2 really telling me to pull my pants down outside. So
3 I said "what?"

4 Q What else did you say, if anything, in
5 response to someone telling you to pull your pants
6 down in the parking lot? Was that all you said,
7 Ms. Curtis?

8 A Yeah. I said what, and she said pull your
9 pants down.

10 Q So Ms. Boney repeated her instruction to
11 pull your pants down. And what did you say after
12 Ms. Boney repeated her instruction for you to pull
13 your pants down?

14 A I took my jacket off. Ms. Creamer grabbed
15 my jacket. I then said, I did pull my pants down.

16 Q You then did pull your pants down, is that
17 what you said?

18 A I did. Ms. Creamer held my jacket up like
19 she was blocking me, and I did pull my pants down.

20 Q How far did you pull your pants down?

21 A I pulled my pants down to my ankles.

22 Q Okay. Did you say anything else to
23 Ms. Boney or Ms. Creamer up to this point, between
24 the point that Ms. Boney first told you to pull the
25 pants down and the time you dropped your pants to

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1 your ankles? Did you say anything else?

2 A Other that wait, when I dropped my pants,
3 I had a pad on. Ms. Creamer said what's that. I
4 pulled the pad out, gave it to her. She searched
5 the pad, she saw nothing in it. I put the pad back
6 between my legs, pulled my pants back up.

7 Q My question -- thank you, Ms. Curtis.
8 We'll get to what you did. I just want to make sure
9 I didn't miss anything else that you said.

10 Between the time that Ms. Boney first told
11 you to pull your pants down and the, and the time
12 that you did, in fact, pull your pants down, you
13 don't remember you saying anything else, correct?

14 A That's correct, I do not recall saying
15 anything else at the time.

16 Q Got it. Why didn't you say --

17 A Why, why didn't I say?

18 Q Hold on. Hold, hold on. I haven't
19 finished the question, Ms. Curtis.

20 A Oh, okay. Okay.

21 Q Why didn't you say anything like no, I'm
22 not, I'm not pulling my pants down outside. I'm not
23 pulling my pants down.

24 Why didn't you say anything like that?

25 A I didn't say anything like that, because

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1 A That's correct.

2 Q Why didn't you say anything to Ms. Boney
3 or Ms. Creamer when Ms. Boney told you to pull your
4 pants down, why didn't you say anything to either of
5 them like hey, just to let you know, I'm not wearing
6 any underwear?

7 A Well, at the time they told me to pull my
8 pants down, I was still shocked that they even told
9 me to pull my pants down. I shouldn't have to tell
10 them that I don't have on any underwear, because
11 they shouldn't know what is under my clothes at all.
12 Whether I had on underwear, whether I didn't have on
13 underwear. So no, I didn't think to say I don't
14 have on underwear, because I was still shocked that
15 I was outside and them telling me to pull my pants
16 down.

17 Q Now, when you pulled your pants down, do
18 you remember Ms. Creamer saying something like well,
19 wow, you're not wearing underwear. Remember that?

20 A Yes, I do remember Ms. Creamer saying I'm
21 not wearing underwear.

22 Q And, and remember Ms. Creamer seemed
23 genuinely surprised that you weren't wearing any
24 underwear, right?

25 A I'm sure she would be surprised that I

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1 wasn't wearing underwear, since she had no business
2 knowing what was under my clothes.

3 Q And, and did, so Ms., Ms. Creamer said oh,
4 you're not wearing underwear or something to that
5 effect, right?

6 A That's correct.

7 Q And did Ms. Boney say anything about you
8 not wearing underwear?

9 A Ms., I don't recall at this time Ms. Boney
10 saying anything. Ms. Creamer was the one that was
11 --

12 Q All right. Let's take a look at another
13 exhibit. This is a, a statement I think you wrote.
14 Let's see if we can find it. Plaintiff's e-mail
15 chain now.

16 MS. OLIVER: This one?

17 MR. PETERSON: That one, uh-huh.

18 BY MR. PETERSON:

19 Q So Ms. Curtis. All right. Ms. Curtis,
20 this is a, a document we produced in discovery. Let
21 me walk through it, and then I'm going to, or show
22 it to you and then ask you a couple of questions.
23 And let's go from the bottom up, since it's an
24 e-mail chain.

25 Starting with the last page of this

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1 you pulled your pants down and Ms. Creamer said
2 you're not wearing any underwear, is it correct that
3 you then on your own initiative pulled your pad out
4 and showed it to Ms. Creamer?

5 A When Ms. Creamer asked what was that
6 between my legs, I then pulled my pad out and gave
7 it to her.

8 Q Right.

9 A I didn't, I, I gave it --

10 Q I just want to be clear. I just want to
11 be clear.

12 Ms. Creamer didn't direct you to hand her
13 your pad, that's true, isn't it, Ms. Curtis?

14 A Yes. When she --

15 Q All right. Very good.

16 A And when she --

17 MR. KASPERS: Please let the, please let
18 the deponent finish answering your question,
19 Kurt.

20 MR. PETERSON: I apologize, Tyler. Ms.
21 Curtis, I apologize to you as well.

22 BY MR. PETERSON:

23 Q If you were not finished with your answer,
24 please do so.

25 A Okay. No, she didn't directly tell me to

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1 hand her my pad, she asked what was that between my
2 legs.

3 Q Thank you, Ms. Curtis.

4 Okay. Did you want Ms. Creamer to feel
5 the pad so that she could determine there was no
6 contraband in them?

7 A At that point, Mr. Kurt, it didn't matter
8 if she felt it or not, because I was already outside
9 with my bottoms off. So why not give it to her to
10 feel. I had already been violated in the worse way.
11 So yes, I gave it to her to feel. She asked what it
12 was, I gave it to her to feel so she could determine
13 there was no contraband inside of me.

14 Q We've already gone over in painstaking
15 detail what you said and what Ms. Creamer said. And
16 Ms. Creamer, according to you, never said anything
17 like hey, I want to feel the pad to make sure
18 there's no contraband in it. So that's clear,
19 Ms. Creamer never said anything like that.

20 A No, she never said anything like that.

21 Q So you wanted her to feel it so she could
22 make darn sure there wasn't anything, no contraband
23 in it.

24 That's why you took off the pad, right?

25 A I took off the pad not because I wanted

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1 her to feel it, but because I, I just let her feel
2 it so she could determine it was no contraband in
3 there.

4 Q Did Ms. Creamer take the pad from you?

5 A Yes, Ms. Creamer did take the pad from me.

6 Q Walk me through exactly what Ms. Creamer
7 did with the pad.

8 A I don't have anything here. But when she
9 took the pad from me, she opened it up, felt it, she
10 said there's nothing in here. She gave it back to
11 me.

12 Q Okay. How long did she spend feeling the
13 pad?

14 A She didn't spend long. I mean it was a
15 thin pad, 'cause she didn't have to spend long. She
16 opened it up, felt the pad and gave it back to me.
17 She, maybe 20 seconds, 15, 20 seconds, if that.

18 Q And what, if anything, did Ms. Creamer say
19 while she was feeling the pad, if anything?

20 A I don't recall at this time her saying
21 anything. After she felt it, she gave it back and
22 said there, there was nothing in it.

23 Q And then what did you do with the pad?

24 A I folded it back up and put it back
25 between my legs.

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1 A When I learned to write statements, sir,
2 when, when I went out to correctional officer
3 school, I learned to write statements. They say
4 keep it short and sweet, tell the details that
5 happened, but you don't have to say everything,
6 every small thing that happened. Keep it short and
7 sweet. So I done what I was taught to do. I kept
8 it short and simple.

9 Q When you pulled your pants down and you
10 had the pad, the pad was covering your, your groin,
11 right?

12 A That's correct.

13 Q So until you removed the pad, your groin
14 was covered, correct?

15 A That's correct.

16 Q It was only after you removed the pad that
17 your groin was then exposed, correct?

18 A That's correct. That's correct.

19 Q Did you --

20 A When I removed the pad, my groin was
21 exposed.

22 Q And, and do you feel, or is it your
23 contention that being, you're having your groin
24 exposed was wrong?

25 A Sir, I feel that having my butt exposed

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1 A No, I didn't.

2 Q Can you describe what this pad looks like,
3 looked like?

4 A It's, I don't know if you know or if you
5 have kids, but if you go to the hospital, you get
6 fishnet underwear and you get long pads. It's like
7 a, a puppy pad. You can fold it over, but it's,
8 it's not a puppy pad, it's a pad for women that just
9 had babies or, you know, I had medical issues going
10 on and I chose to wear the pad. But it, it's, the
11 closest thing I can explain to a man is it's like a
12 puppy pad and you fold it over.

13 Q Okay. Got it.

14 Roughly how, how big was this pad? How,
15 how many inches by how many inches? Even ballpark,
16 Ms. Curtis.

17 A I have no idea. It's, I have a little
18 puppy pad if you want to see the puppy pad. I can
19 show you a puppy pad. And --

20 Q Is it similar in size, Ms. Curtis, and if
21 it's right there handy, that would be great. I just
22 want to, I just want to get a ballpark idea of how,
23 what the size of the pad was you were wearing.

24 A Okay. Let me, let me --

25 THE VIDEOGRAPHER: Well, if this is a good

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1 far as the cysts with my body were okay.

2 Q And has any medical care provider ever
3 directed or suggested that you wear these pads?

4 A No, they have never suggested that I wear
5 them. But as a woman, when you have bodily fluids
6 leak out, you don't want them to, in my case, leak
7 out on my pants or in another woman's case leak out
8 on their underwear. So that was just something that
9 me as a woman knew to do.

10 Q During 2020 up through at least October
11 4th, how many, how often did you wear those pads
12 when you went to work?

13 A Every, every day. Every time I stepped
14 into the facility, I had one on.

15 Q Got you. Okay. Thank you.

16 All right. So back to your vehicle. You
17 described for us you got to the vehicle, pulled down
18 your pants, took off the pad, put the pad back on,
19 buttoned your pants back up. What happened then?
20 So you now get your pants back on. What, what
21 happened next?

22 A After I pull my pants back up, Captain
23 Boney then came to the front of my truck. I stepped
24 to the side, and she just looked in the front -- she
25 didn't do a thorough search. She just like looked

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1 in the driver seat and on the floor of the driver
2 seat of my truck.

3 Q Did she say anything while she looked in
4 your vehicle?

5 A No. She just looked. I, me knowing she
6 was probably looking for contraband, but she just
7 looked.

8 Q And during, while Captain, while Ms. Boney
9 was looking in your vehicle, did you say anything to
10 her?

11 A No, sir, I did not say anything to her at
12 all.

13 Q Did Ms. Creamer say anything to anybody
14 while Ms. Boney was looking in your vehicle?

15 A No, sir, Ms. Creamer did not say anything.

16 Q Okay. So now, Ms. Boney looked in your
17 vehicle, then what happens?

18 A Then --

19 Q The facility -- I'm sorry to interrupt
20 you, Ms. Curtis. So walk, eventually you returned
21 back to the facility, it's on the videotape, I'm
22 just trying to get a handle on what happened after
23 now, Ms. Boney looked in your vehicle, walk me
24 through what happens next.

25 A After Ms. Boney looked in my vehicle, me,

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1 Ms. Boney and Ms. Creamer proceeds to walk back to
2 the facility and inside the gates.

3 Q Okay. You walked back into the facility.
4 How did you know to walk back into the facility?
5 Who, who said what to whom, or --

6 A Ms. Boney, Ms. Boney, she was like come
7 on. And she also took my car keys.

8 Q I'm trying to figure out what was said.
9 You, I, I, I heard you went back into the facility.
10 How did you all just --

11 A Ms. Boney --

12 Q How did you know to get back -- who said
13 what so that you all went back to the facility?

14 A Captain Boney, after she looked in my
15 truck, she said come on. And we walked back through
16 the facility, and she said let me have your car
17 keys.

18 Q Okay. And then you walk back into the
19 facility, right?

20 A I, I gave her my car keys as we were
21 walking back to the facility, and we proceeded to
22 walk back into the facility, yes, sir.

23 Q Oh. And again, you're trailing off and I
24 am an old man with some bad hearing to begin with,
25 Ms. Curtis. So if you could speak up just a little

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1 bit louder for me, that would be really helpful.

2 A After, after she looked in my vehicle, she
3 said come on. On the way back into the facility,
4 she told me to give her my car keys. I gave her my
5 car keys as we were walking up to the gate. I gave
6 her my car keys, then she opened the gate and we
7 proceeded to walk into the facility.

8 Q Thank you, ma'am.

9 Did you say anything to Ms. Boney during
10 this time period?

11 A No, sir, I did not say anything to
12 Ms. Boney during this time period.

13 Q Do you remember Ms. Creamer saying
14 anything during this time period?

15 A At this time, I do not recall Ms. Creamer
16 saying anything.

17 Q Okay. All right. So you eventually, you
18 get back into the facility, and we'll pull up that
19 video in just a second.

20 Given the description you just gave us
21 under oath, at the time that you left the facility
22 initially, went to your vehicle, we're at your
23 vehicle, you remove your pad, put your pad back on,
24 and then you return to the facility. You have given
25 a description of those events.

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1 It's true that at no point during that
2 entire time did Ms. Boney or Ms. Creamer ever touch
3 you.

4 A No, they did, they never touched me.

5 Q Very good. All right. Now, let's go back
6 to the video.

7 MR. PETERSON: Amy, if we can get rid of
8 this, please. Pull up the video again if you
9 will, please. Very good. Thank you. Bear
10 with us, everybody. We're pulling up the
11 video. Hang on for a second here. All right.
12 Back to the video, everybody. And move this
13 forward. Okay.

14 BY MR. PETERSON:

15 Q Okay. I'm going to play a clip from the
16 video, Ms. Curtis, and then ask you a couple
17 questions.

18 Ms. Curtis, do you have the video? Do you
19 have, do you see the video?

20 A Yes, sir, I see the video.

21 O Okay. All right. Here we go. Ms. Curtis.

(Video.)

23 BY MR. PETERSON:

24 | O I'm going to stop the video right there.

25 | Ms. Curtis, is this a picture of, of you

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1 When you walked through the metal detector
2 again in the video clip we just watched, did it
3 activate?

4 A No, sir. When I walked through the metal
5 detector the last time, it did not activate.

6 Q Okay. Why do you believe the metal
7 detector did not activate this time when it had
8 activated on several other times you tried to walk
9 through it the same day?

10 A Sir, I honestly don't know why the metal
11 detector didn't react this time.

12 Q Okay. So according to you, it went off
13 sometimes, nothing -- strike that.

14 It went off several times when you tried
15 to get through it. You went to the parking lot, you
16 now go through it and now it doesn't activate.
17 You're not sure why it didn't activate the second
18 time. I get that. Perfectly, perfectly fine, Ms.
19 Curtis.

20 Would you agree with me that it's
21 appropriate, it was appropriate for you not yet to
22 be allowed access into the facility, given the
23 inconsistent readings on the metal detector. You
24 would agree with me that that was appropriate?

25 A Yes, I agree that it was appropriate for

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1 open.

2 Q Got it. And then you, so you roll your
3 window down, Captain Boney takes your keys. Then
4 what happens next, Ms. Curtis?

5 A Captain Boney then walked back into the,
6 into the facility. I was sitting outside in the
7 car, in the car smoking my Black and Mild. And I
8 seen a few officers pulled up. And I saw Officer
9 Garnett pulled up. So I walked to like the middle
10 of the roadway between my car and her car, because
11 she parked right behind me. And I was like telling
12 her what was going on, like, man, this is some BS is
13 what I said. The metal detector kept going off and
14 they told me to go through, but they kept telling me
15 to go through. And I, when I went back through, it
16 didn't go off. So I'm not even sure why I'm out
17 here.

18 Officer Garnett then told me (inaudible)
19 that's crazy them doing you like that (inaudible).
20 Lieutenant Corporal, Sergeant Corporal, I can't
21 remember --

22 THE COURT REPORTER: I'm, I'm so sorry to
23 interrupt.

24 MR. PETERSON: We, we can't hear you.

25 THE COURT REPORTER: Yeah.

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1 returned to the facility. And then you were
2 describing some conversation you had with Officer
3 Garnett.

4 Just first of all, did I summarize that
5 correctly?

6 A Yes, sir, that was correct.

7 Q All right. At, at some point, Ms. Boney
8 came back to your vehicle after she, you got the
9 keys, rolled down the window, she, she took the
10 keys, she went back in the facility.

11 At some point she does come back to your
12 vehicle, right?

13 A That's correct, she did come back.

14 Q Roughly how long was it between the time
15 that she left your vehicle after you rolled down the
16 window, she goes into the facility and back? How
17 long roughly was that period of time where Ms. Boney
18 was gone?

19 A Roughly a few minutes. I don't know the
20 exact, exact minutes, but it was, it was a few
21 minutes.

22 Q Two to ten, two to five, two to, even --
23 I'm not going to --

24 A Ooh. I, I would say maybe two to five --

25 Q Okay.

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1 know, right there in the parking lot on the -- I'm
2 not sure what it's called, but you park your car
3 right in front of it. I'm not sure what it's
4 called, but she told me I could sit right there.

5 So I sat down while Officer Zanders was
6 searching my vehicle. After she got done searching
7 my vehicle, I was like so is there any way that we
8 can go somewhere or you could do a pelvic search on
9 me or anything. And she said that okay, you can
10 pull your pants down and lay back in your truck.

11 So I pulled my pants down, I laid back in
12 my truck. She told me to put my legs on the
13 steering wheel. I put my legs on the steering
14 wheel. And she put on gloves, and she, she put two
15 fingers inside my vaginal area and she felt up in my
16 vaginal area. And she was like she's good, she
17 doesn't have any contraband.

18 THE COURT REPORTER: Okay. I didn't hear
19 the last part. "She was like".

20 THE WITNESS: She said that she's good,
21 she doesn't have any contraband.

22 THE COURT REPORTER: Thank you.

23 BY MR. PETERSON:

24 Q And, and thank you, Ms. Curtis.

25 And then what happened? You pulled up

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1 same procedures, same regulations. I asked for her
2 to perform a cavity search on me, because I've seen
3 where officers, they couldn't prove that they had
4 anything on their person or anything, so they would
5 say well, it's inside of them. So I wanted to X-out
6 all options that they had.

7 Q Thank you, Ms. Curtis.

8 You're not personally aware of any
9 CoreCivic employee ever having a cavity search
10 performed on them by any other CoreCivic employee,
11 are you, Ms. Curtis?

12 A No. A CoreCivic employee cannot cavity
13 search another CoreCivic employee. The police
14 officer has to cavity search at either the police
15 station or the hospital.

16 Q Okay. Got it. Thank you.

17 Now, you indicated that Officer Zanders
18 conducted a cavity search, you, you had to take your
19 pad off, right?

20 A That's correct.

21 Q When you took the pad off, where did you
22 put it?

23 A I put it in my front seat, in the
24 passenger seat of my car.

25 Q And then I thought I heard you say you,

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1 Officer Currie to let her know what was going on,
2 because Officer Currie was not too far from me. She
3 was in the next city over. And I was in Alamo. I
4 don't too much know people that way.

5 Q Okay. Did you talk to Officer Currie
6 before or after Officer Zanders allegedly performed
7 a cavity search?

8 A Before. I was on the phone with her
9 before, while officer Zanders was looking through,
10 performing the search of my vehicle.

11 Q Got it. Okay. Thank you, Ms. Curtis.

12 All right. Officer Zanders completes
13 this, the searches you just described. Walk me
14 through the rest of the sequence of events until you
15 left the facility, Ms. Curtis.

16 A After she completed the searches, that's
17 when Captain Boney told me to go home, call the
18 investigator the next morning, which would be that
19 Monday morning. She told me to call, don't return
20 back to work until I talk to the investigator or the
21 warden.

22 Q Okay. Got it. Since October 4th, 2020,
23 have you discussed what happened that day with
24 Officer Boney in any way?

25 A No, I have not talked to Officer Boney at

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1 A No, I haven't talked on social media about
2 what happened.

3 Q Shifting gears here a little bit,
4 Ms. Curtis.

5 You're not aware of any employee at the
6 Wheeler facility who was ever directed to remove any
7 clothing in connection with any search, are you, Ms.
8 Curtis?

9 A No, I've never heard about any employee.

10 Q You're not aware of any employee at the
11 Wheeler facility ever being subject to a cavity
12 search.

13 Is that true, Ms. Curtis?

14 A Do I know for sure? No, I haven't heard
15 for sure. In my training classes that when we first
16 started, they do tell us about some inmate or
17 officer that have been cavity searched. They have
18 to go to the hospital, or they have to go to the
19 police station. But as far as me seeing, no, that's
20 something I learned in class.

21 Q Okay. Speaking of your training, are, are
22 you aware of any training that you believe
23 Ms. Creamer or Ms. Boney should have gone through
24 with regard to searches but didn't?

25 A Yeah, I feel like Ms. Boney and Creamer,

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1 A I'm not aware of it. I know Ms. Boney
2 talked to someone on her phone when she went to the
3 back. I don't know what was said. I don't know who
4 she was talking to, but I'm not aware that anyone
5 told her to tell me to pull down my pants.

6 Q And similarly, you're not aware of anyone
7 directing Ms. Boney to look inside or search your
8 vehicle, correct?

9 A That's correct. I'm not aware of anyone
10 telling her to look inside or search my vehicle.

11 Q And similarly, you're not aware of anyone
12 directing Ms. Boney to tell Officer Zanders to
13 conduct a strip or a cavity search of you, correct?

14 A Officer, Captain Boney didn't tell Officer
15 Zanders to conduct a cavity or a strip search on me,
16 sir.

17 Q Okay. And similarly, you're not aware of
18 anybody directing Officer Boney to tell Officer
19 Zanders to search your vehicle?

20 A No, sir, I'm not aware of that at all.

21 Q Okay. Are you aware of any other instance
22 where police officers were called to the Wheeler
23 facility in connection with an employee attempting
24 to access the facility?

25 A I know police, when police are called to

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1 Does everybody see some pictures? Does
2 everybody have access, everybody see them? Do you
3 see them, Ms. Curtis?

4 A Yes, sir, I see them.

5 Q Okay. We produced these pictures in
6 discovery.

7 Do you recognize these signs, Ms. Curtis?

8 A Yes. Those are the signs at the front
9 gate telling us no contraband, mostly telling us the
10 rules of the facility. Have our I.D.

11 Q Okay. All right.

12 A No guns, no weapons, no cell phones.

13 Q Okay. And as you saw me scrolling down,
14 here is another set of signs. They appear to me to
15 be identical.

16 Do you recognize that these signs are
17 posted at the, adjacent to the parking lot at the
18 Wheeler facility?

19 A Yes, sir, those signs are out there.

20 Q Okay. And these, this sign over to the
21 left on this side says at the very bottom right
22 here, any person or motorized vehicle entering
23 beyond this point is subject to being searched,
24 including a search by a drug dog.

25 Do you see that?

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1 A Yes, sir.

2 Q And, and this sign --

3 A Uh-huh (affirmative).

4 Q This sign was posted at the parking lot at
5 the Wheeler facility while you were employed there,
6 correct?

7 A Yes, sir, that sign was posted there when
8 I was employed at the Wheeler facility.

9 Q As were these signs were posted at the
10 entrance to the Wheeler facility while you were
11 employed there, correct?

12 A Yes, sir, those signs were posted at the
13 entrance of the Wheeler facility while I was
14 employed there.

15 Q Very good. Very good.

16 Changing gears a little bit, and you can
17 get rid of that, Amy.

18 Apart from this lawsuit, Ms. Curtis, have
19 you ever filed any other lawsuits against anyone or
20 any business?

21 A No, sir, I've never filed a lawsuit
22 before.

23 Q Have you ever filed any administrative
24 charges, including with the Equal Employment
25 Opportunity Commission or any other administrative